

REDACTED – FOR PUBLIC INSPECTION

Study Area Code	105111
Study Area Name	Northern New England Telephone Operating Co.-Maine
Program Year	2014
Contact Name	Barbara Galardo
Contact Telephone Number	207-535-4126
Contact Email Address	bgalardo@fairpoint.com

<u>Exchange</u>	<u>Request Date</u>	<u>Business/ Consumer</u>	<u>Reason Request Unfulfilled</u>
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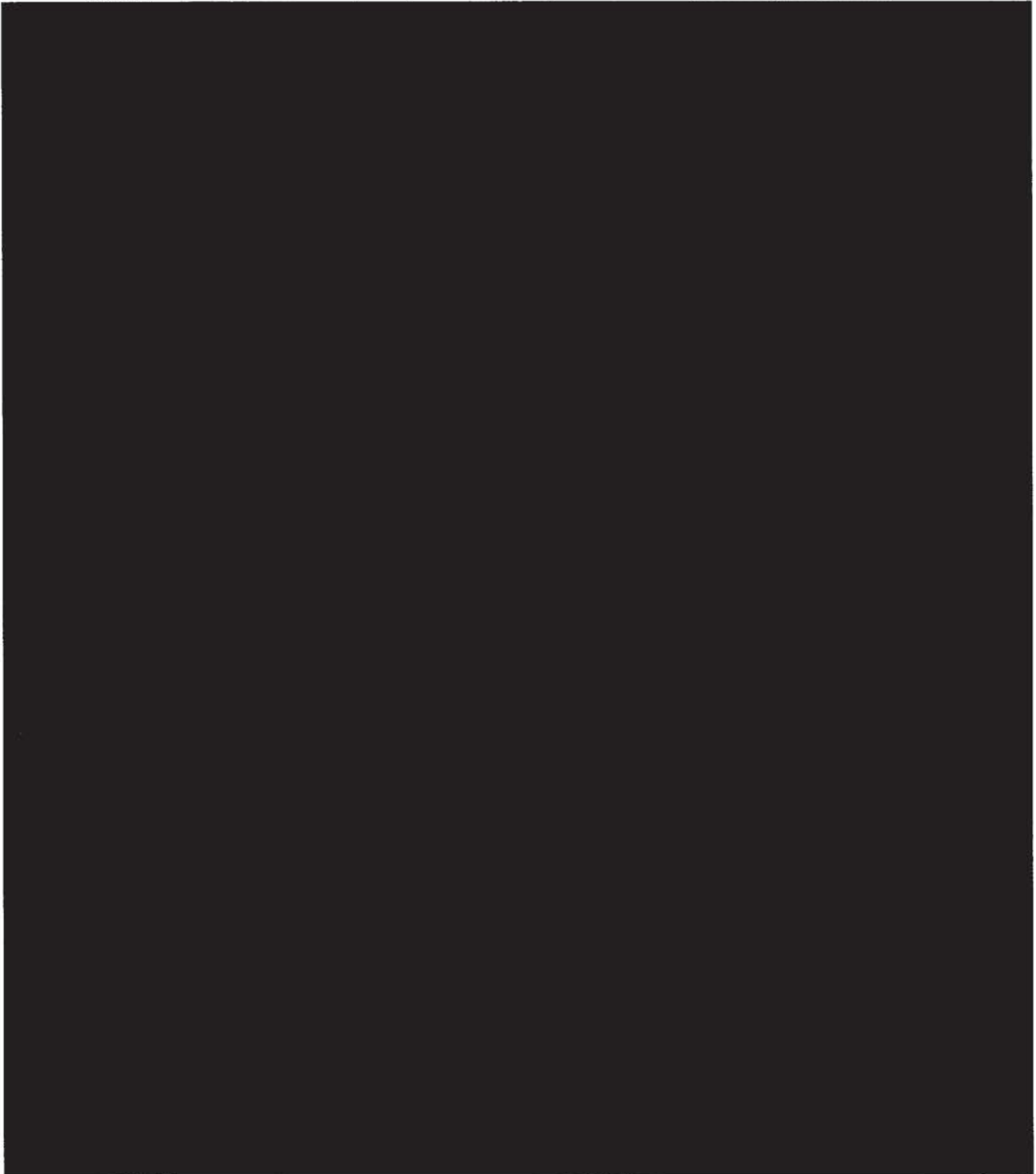
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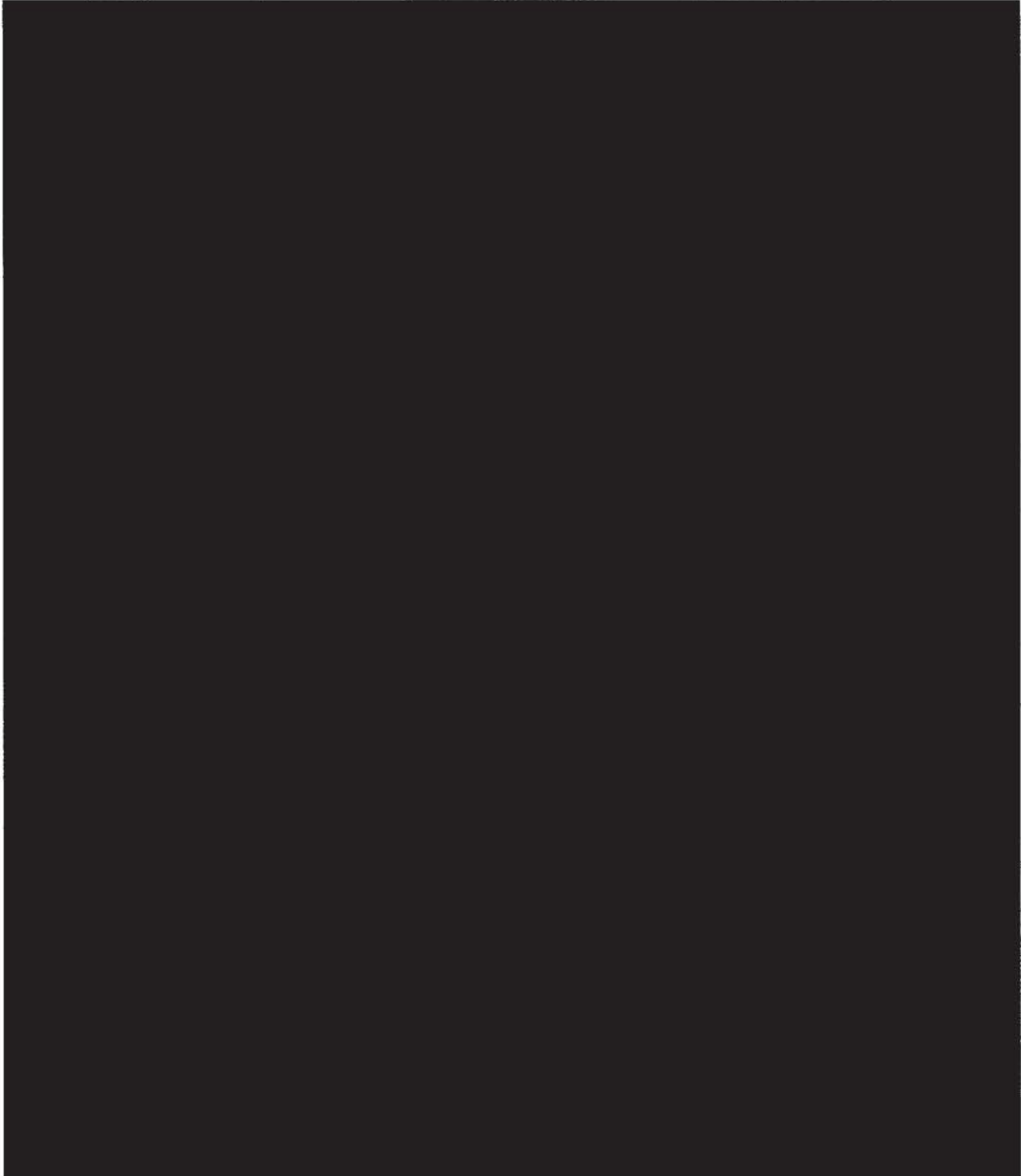
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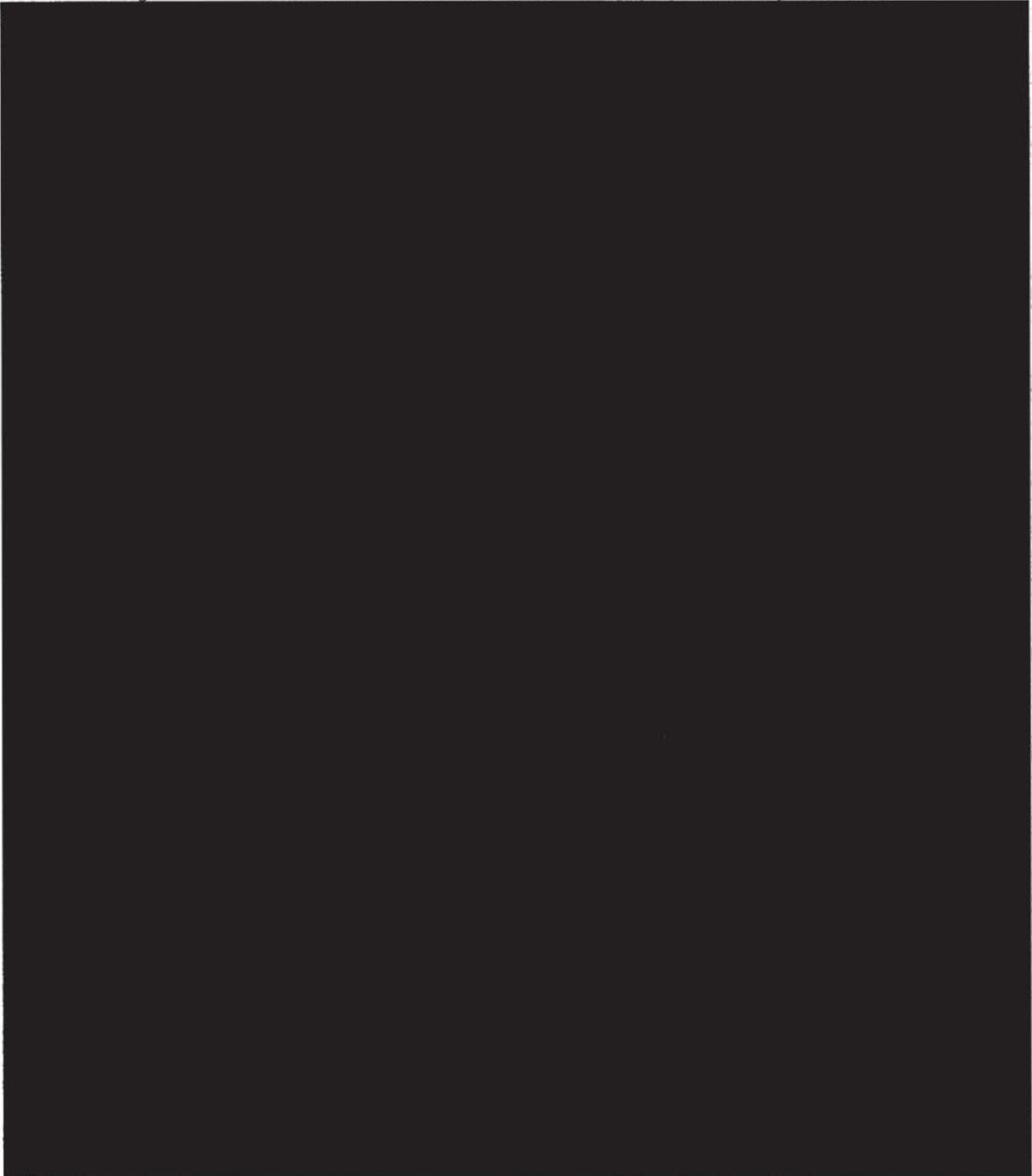
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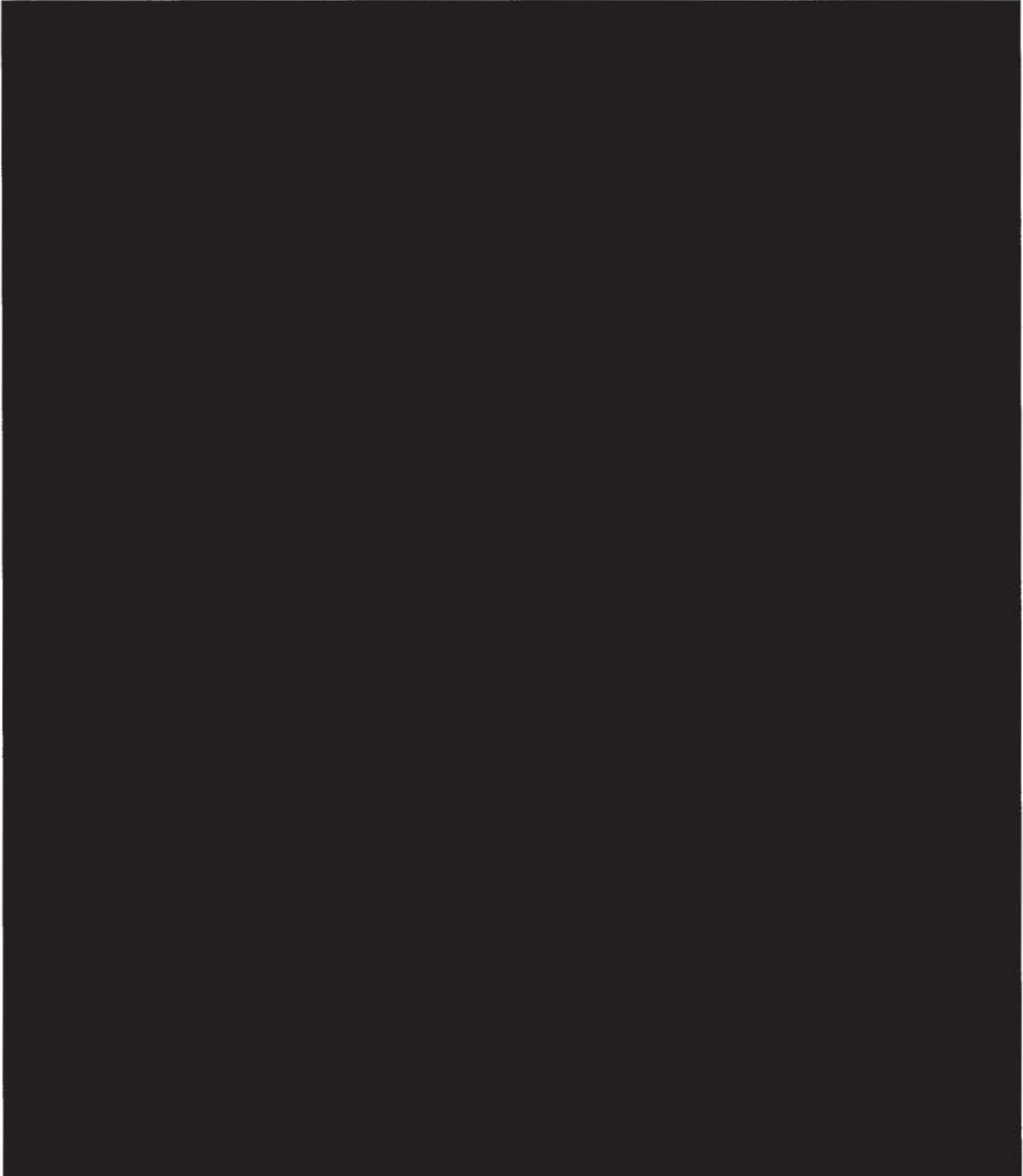
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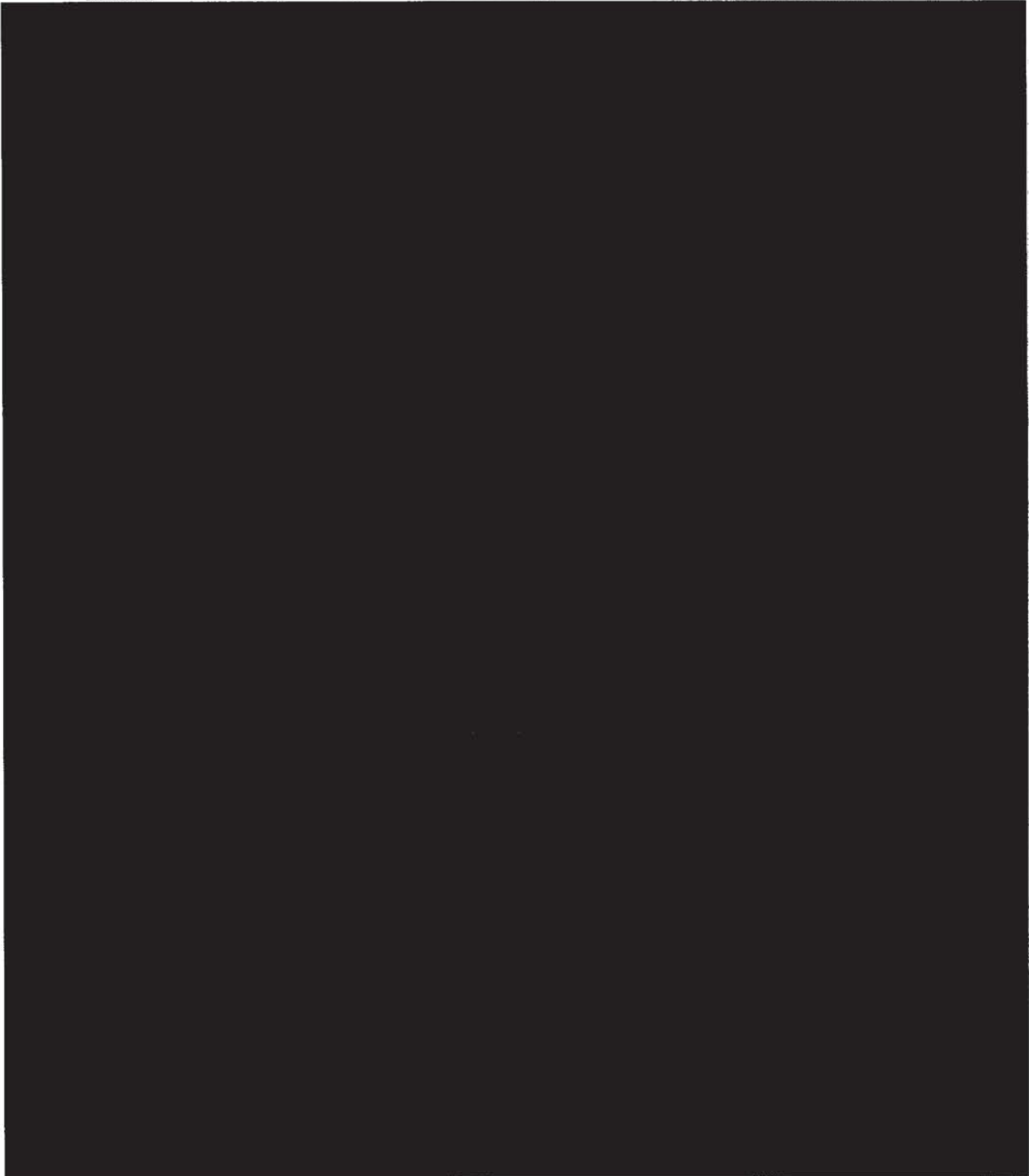
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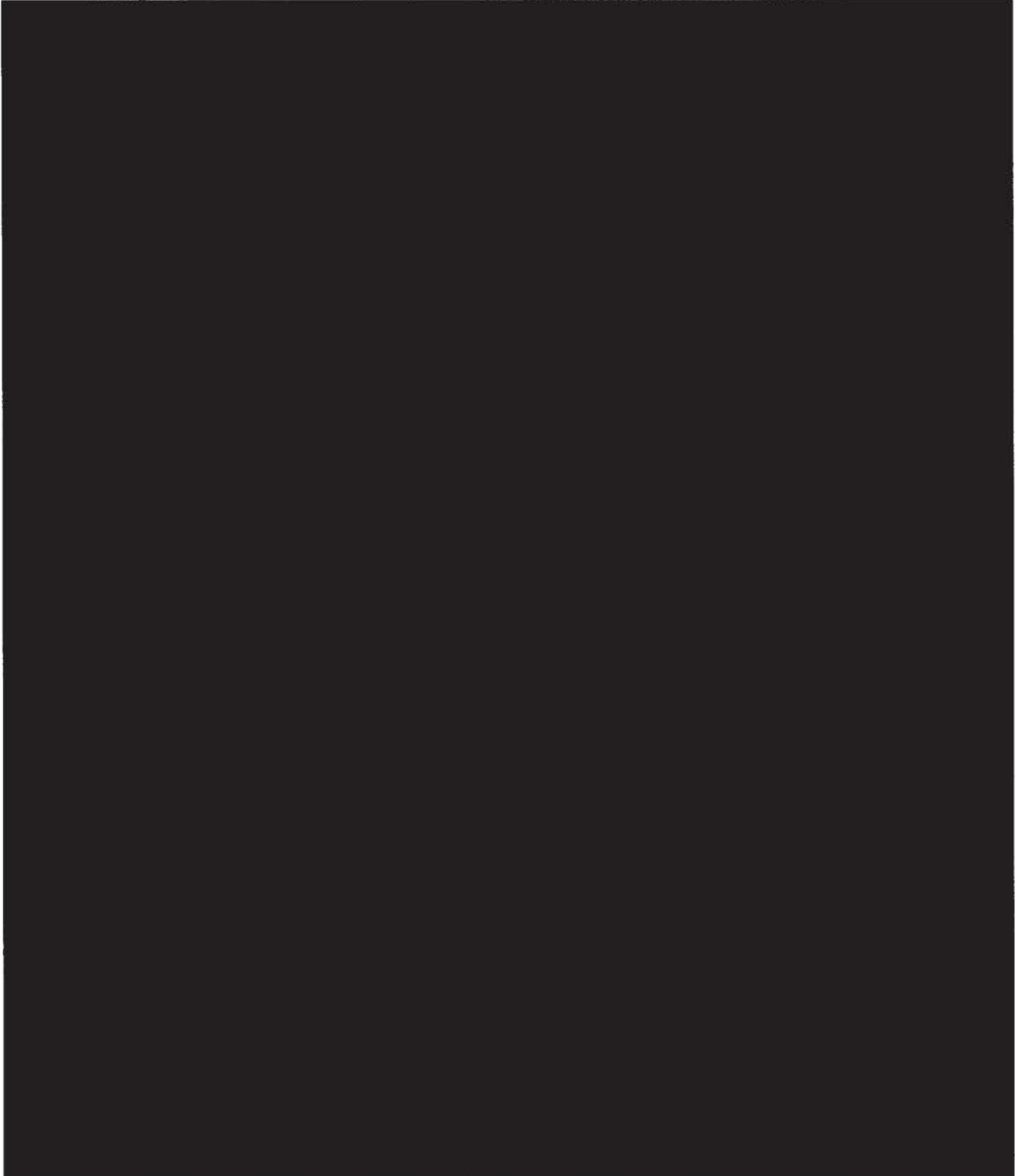
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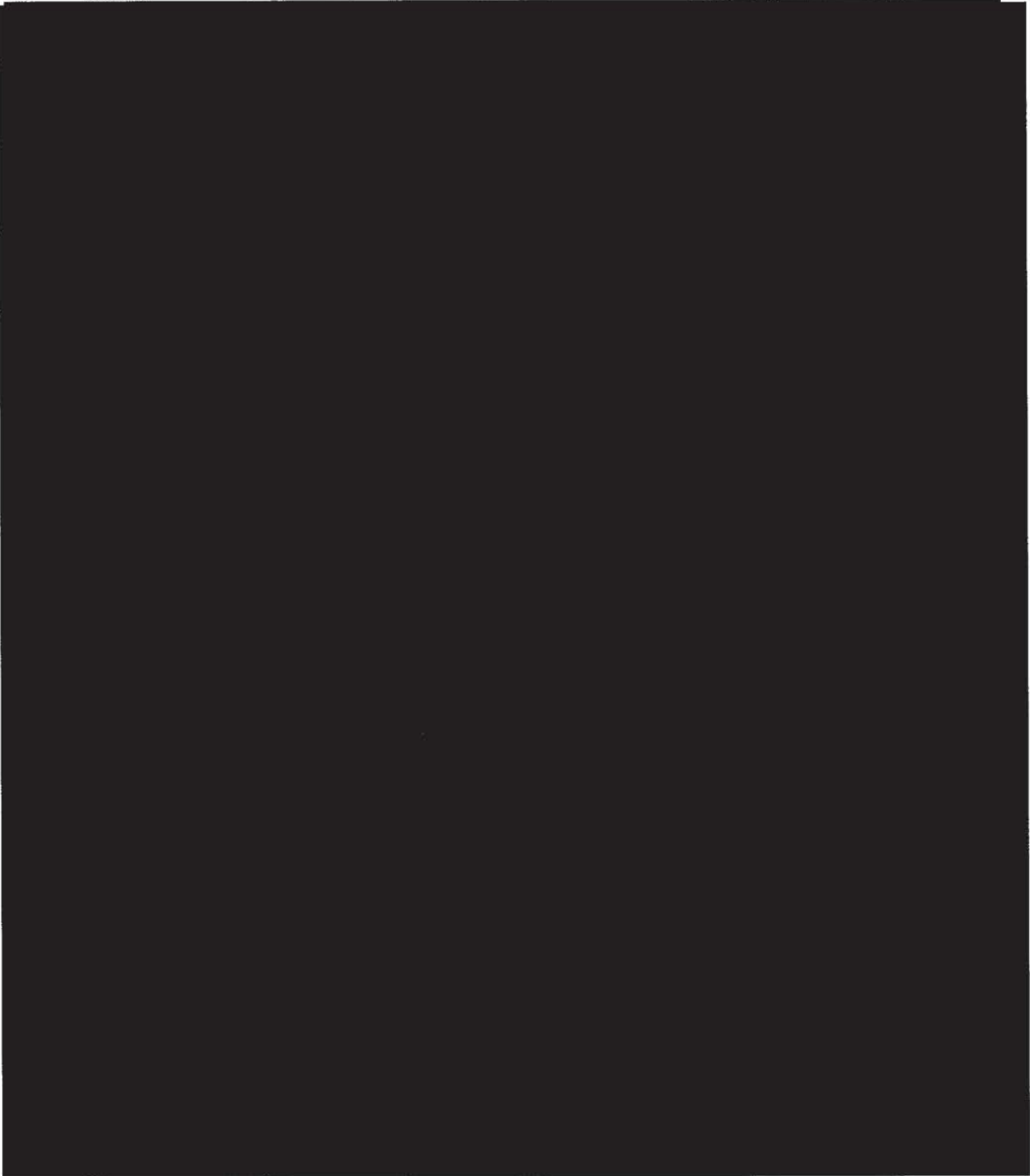
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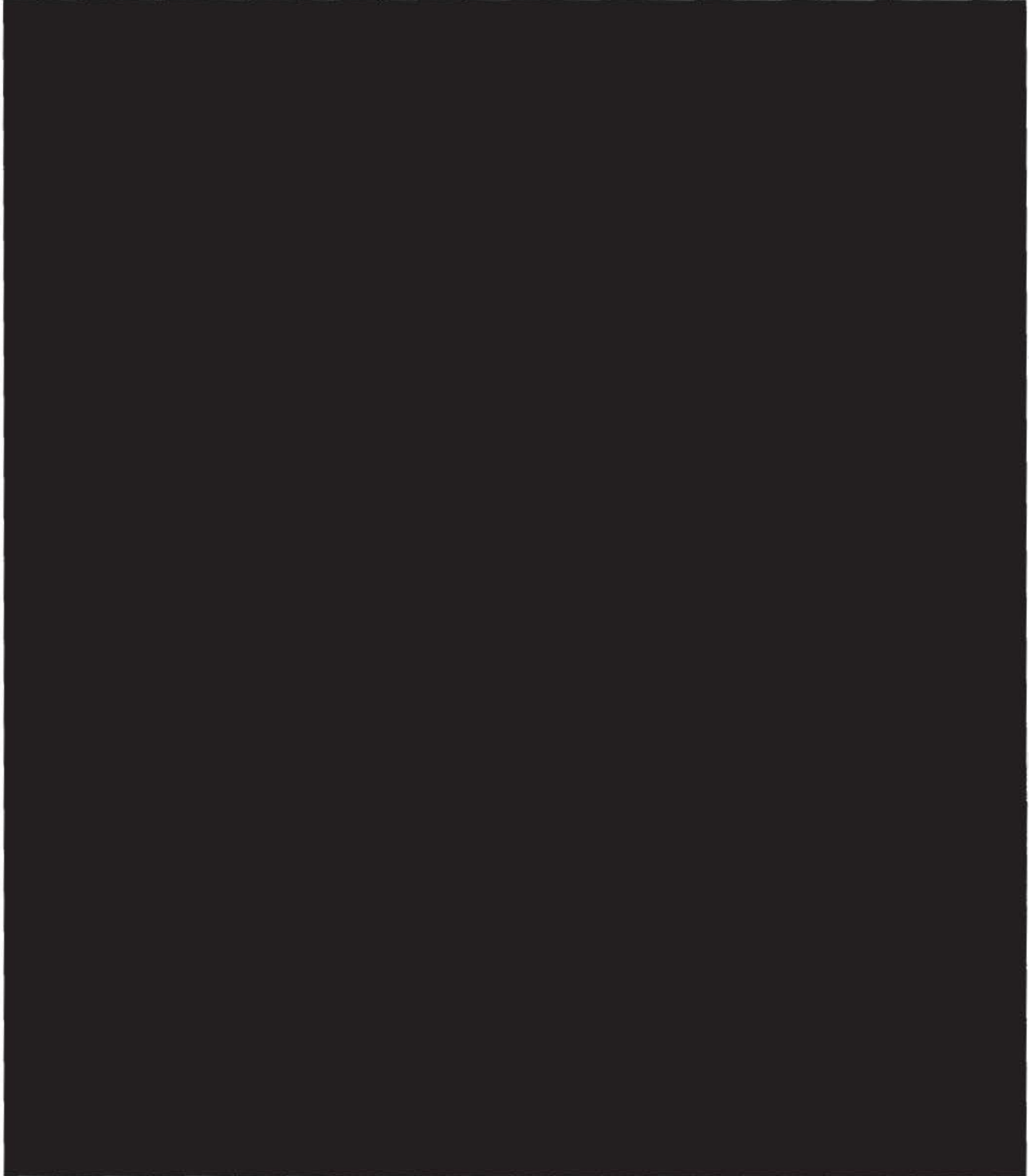
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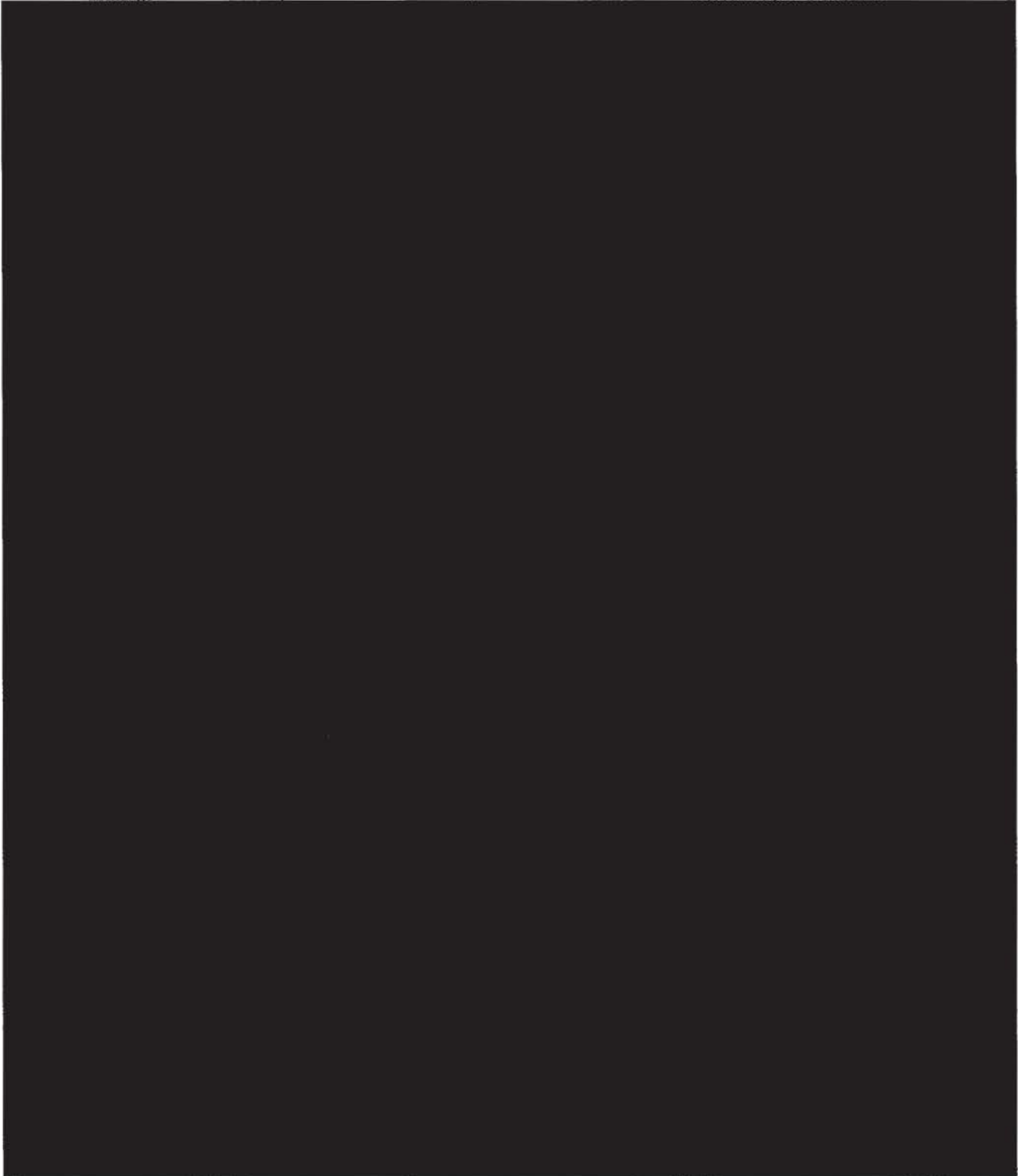
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Northern New England Telephone Operations LLC

Maine

105111

Line 510: Service Quality Reporting/Consumer Protection Rules Compliance

Northern New England Telephone Operations LLC; hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with service quality and consumer protection provisions under state law. These provisions include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Maine Public Service Commission which discloses rates, terms and conditions of service to customers; (2) compliance with state consumer protection provisions relating to Customer Services as identified in the Code of State Regulations, compliance with provisions for Quality of Service as identified in the Code of State Regulations, compliance with Service Objectives as identified in the Code of State Regulations, compliance with customer Inquiry procedure as identified in the Code of State Regulations, compliance with Dispute standards as identified in the Code of State Regulations; (3) compliance with truth-in-billing requirements; and (4) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis. In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."³

Northern New England Telephone Operations LLC, The companies do report Service quality metrics on a quarterly basis. This is based on a verbal agreement with the Maine Public Utilities commission (the PUC). NNE Maine reports monthly on 7 metrics: The seven metrics are – Network Trouble report rate, % troubles not cleared in 24 hours, % install appointments not met, average delay days for missed appointments, and outages, business and repair office answer time, and complaints. An annual summary is filed for penalty calculations.

If a customer has a concern about their FairPoint Communications' service or billing, he/she can contact repair service, technical support or customer service with information found on their statement. Customers may also contact agencies, through information posted in the phone directory, website, and tariff pages. All consumer complaints whether from Attorney Generals' offices, Public Utility Commissions, Better Business Bureaus, Federal Communications Commission and all other agencies are sent to the FairPoint Communications' Maine office via U.S. Mail or by electronic mail at consumer@fairpoint.com. The complaints are directed to the appropriate responsible Company Team member within FairPoint Communications for resolution and response to the customer.

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.



FairPoint Communications
1 Davis Farm Road
Portland, ME 04103

Business Continuity Plan Overview

Introduction

FairPoint Communications, Inc. ("FairPoint") is committed to maintaining a vigilant state of disaster preparedness for the interests of our customers, stockholders, employees and other critical stakeholders.

The purpose of our Business Continuity Plan ("BCP") is to define the disaster preparedness and recovery protocols and procedures required to restore FairPoint's critical business support functions, inside and outside plant systems and operations within FairPoint's operating footprint.

BCP components detail FairPoint's procedures for preparing for and responding to an emergency situation affecting our ability to deliver core services to our customers and our ability to meet legal dictates, and regulatory requirements.

This document discusses the following:

- BCP Scope
- BCP Components
- Plan Maintenance

BCP Scope

FairPoint's business continuity response planning is concentrated on two critical operational areas:

- Customer Interfacing – It is recognized that a "business impact" only occurs when an external-interfacing element is disrupted. In essence, this means that if FairPoint experiences a disruptive event, but one that does not breach the outer-shell of the FairPoint operation and interrupt critical customer services, customer product or other external end-user, then it does not have a business impact, as defined by the BCP
- Infrastructure Integrity – Without critical infrastructure systems, the ability for all other FairPoint business operations (back / front office) can come to a halt. It is these infrastructure systems that provide the critical human-factor of our customer-interfacing services. Critical infrastructure would address such services / systems as, building space for staff and equipment, service utilities, telecommunications and data network, IT network, and related infrastructure based items.

The BCP has been developed to assure the continuity of critical customer interfacing services and systems should a physical incident or workforce disruption event occur, which affects:

- Information Technology ("IT")
- Administrative and Support Operations
- Inside and Outside Plant Operations
- Network Operations Center ("NOC")
- Enhanced 9-1-1 ("E-911")
- Dispatch
- Repair Center

FairPoint has developed response / recovery strategies addressing physically disruptive incidents and workforce related disruptive incidents. All response strategies are based on recovery time objectives of those department functions and critical infrastructure systems essential to sustain customer interfacing services.



FairPoint Communications
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Portland, ME 04103

BCP Components

The BCP consists of several components:

- Operational Preparedness for Expected Events (i.e. weather related events)
- Event / Crisis Communication Plan
- Redundancy Mapping
- Department Recovery Plans
- Information Technology Continuity Plan

The following is a brief summary of the plan components.

Operational Preparedness for Expected Events

Weather events such as snow, ice and wind can negatively impact power and communications infrastructure. While this threat cannot be eliminated, FairPoint takes steps to mitigate a storm's impact through preparedness and response. Steps include:

- Pre-event planning based on information provided by National Oceanic and Atmospheric Administration ("NOAA")
- Coordinate planning and recovery efforts through state emergency management groups
- Engage supply chain vendors to deliver additional stock prior to the expected event
- Inspect, test and fuel emergency generators in anticipation of a power outage
- Reallocate / relocate staff in order to respond to the pending event

Event / Crisis Communication Plan

Communications is a key element to respond and recover business operations. Event / Crisis Communications are facilitated by FairPoint's Risk Management Team who assume the role of incident command from the onset of the event until normal operations are resumed.

FairPoint uses a dual level communication strategy as part of the Event Communication Plan. The primary level is the workgroup comprised of both employees and vendors that are directly involved in the recovery work. The secondary level consists of internal interested parties made up of our Strategic Leadership Team. The role of the secondary level is to facilitate communications both internally and externally regarding the event and our path to response and recovery. For 2014, FairPoint has partnered with SunGard and will be deploying a hosted event communication platform in order to increase our speed and reach of communications during an event.

Redundancy Mapping

The process of redundancy mapping reviews operations within the FairPoint organization to identify alternate facilities and work locations that can be used in the event a primary location is not accessible. Given the geographic spread of FairPoint's Northern New England footprint, capabilities exist to relocate operations from event impacted areas. Through the mapping process, FairPoint is able to identify single points of failure and develop alternative work processes.

Department Recovery Plans

Each department has developed a recovery plan based on its critical operations as they pertain to the deliverables they contribute to our customers. FairPoint has triaged the recovery efforts based on the concept of customer servicing impact. Federal and State regulatory requirements, along with E-911 needs, have a high level of consideration in addition to the business impact concerns. The BCP goal is to minimize the disruption duration as much as is practical and provide a level of risk mitigation that will maintain critical operations. The recovery plans are built around a 24-hour to 72-hour response plan. This methodology



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focuses on the immediate steps that need to be taken to recover functional operations within short duration events (less than 24 hours) and well as long term plans to maintain functionality during an extended event (up to, or greater than 72 hours).

IT Recovery Plan

Like most operations, FairPoint is dependent on an IT infrastructure to conduct business and serve customers. Because of its importance, FairPoint has a continuity plan established specifically for IT operations. The IT continuity plan addresses security and access control of data sites, onsite / offsite data backup methods, processes for sequencing of system(s) recoveries and ultimately the use and execution of our established Disaster Recovery Site located outside the FairPoint footprint.

Plan Maintenance and Exercising

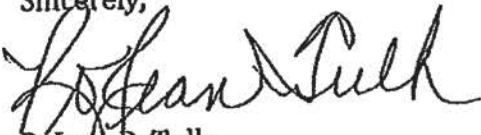
The BCP is a so called "living" document. Updates to the plan are ongoing with changes incorporated annually at a minimum. Individual plan components are reviewed with oversight from FairPoint's Risk Management Team. In 2013, FairPoint began the process of migrating the BCP onto a cloud based solution which will allow access to the plan components from any computer, smartphone and tablet.

December 30, 2014

[REDACTED]

Please feel free to contact me at 207-535-4248 or via email at rtulk@fairpoint.com if you have any questions or concerns, or if you would like to arrange a date for a meeting or call. I look forward to meeting and working with you.

Sincerely,



Rojean D. Tulk
Director/Government Relations - Maine

December 30, 2014

[REDACTED]

Please feel free to contact me at 207-535-4248 or via email at rtulk@fairpoint.com if you have any questions or concerns, or if you would like to arrange a date for a meeting or call. I look forward to meeting and working with you.

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Sincerely,

A handwritten signature in cursive script, appearing to read "R. Tulk".

RoJean D. Tulk

Director/Government Relations - Maine

Tulk, RoJean [Portland, ME.]

From: Tulk, RoJean [Portland, ME.]
Sent: Friday, December 12, 2014 11:51 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]
Attachments: [REDACTED]

Best regards,
RoJean

RoJean Tulk - Director of Legislative Relations, Maine
FairPoint Communications | One Davis Farm Road; Portland, ME 04103 | rtulk@fairpoint.com
207.535.4248 office | 207.233.9375 cell | 207.797-1221 fax

Please consider the environment before printing this email.

December 12, 2014



¹ For this Program, tribal lands include any federally recognized Indian tribe's reservation, pueblo, or colony, Indian allotments and any land designated by the Federal Communications Commission for purposes of the Lifeline Program.